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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

SECURITIES AND EXCHANGE
 COMMISSION,

Plaintiff,

vs.

CHARLES TRALKA, THOMAS
 BRAEGELMANN, MATTHEW
 SULLIVAN, JORDAN E. GOODMAN,
 ROBERT L. BARR, and GOOD STEWARD
 CAPITAL MANAGEMENT, INC.,

Defendants,

and

SECURED REAL ESTATE INCOME
 FUND I, LLC and SECURED REAL
 ESTATE INCOME STRATEGIES, LLC,

Relief Defendants.

Case No.: 5:23-cv-04958-EKL
 Judge: Eumi K. Lee
 Magistrate Judge: Nathanael M. Cousins

**UNOPPOSED REQUEST FOR
 EXTENSION OF TIME TO
 DISCLOSE POTENTIAL EXPERT
 REPORT TOPICS**

Pursuant to Fed. R. Civ. P. 6(b) and 7(b), as well as Civil L.R. 6-1(b), and 6-3, Named Defendants Charles Tralka, Thomas Braegelmann, Matthew Sullivan, Robert L. Barr, and Good Steward Capital Management, Inc., and Relief Defendants Secured Real Estate Income Fund I, LLC and Secured Real Estate Income Strategies, LLC, (Named Defendants, together with Relief Defendants, referred to as “Defendants”), by and through counsel, hereby file this Unopposed Request for Extension of Time to make disclosures regarding potential topics of expert reports.

1 The parties previously stipulated, and the Court subsequently ordered, that the fact
2 discovery cutoff be extended until March 24, 2025. However, for the reasons set forth in the
3 Declaration of Taylor J. Smith, attached hereto as **Exhibit A**, the Defendants request that the
4 deadline to make disclosures regarding potential topics of expert reports be extended by an
5 additional 60 days, until Tuesday, March 11, 2025. Such adjustment is not expected to impact
6 any other scheduled events as ordered by the Court.

7 Accordingly, the Defendants request that the Court enter an order extending the deadline
8 to make disclosures regarding potential topics of expert reports by an additional 60 days, until
9 Tuesday, March 11, 2025.

10 A proposed order granting the requested extension has been submitted herewith.

11 DATED: January 10, 2025.

12 **KUNZLER BEAN & ADAMSON, PC**

13 /s/ Taylor J. Smith

14 Matthew R. Lewis

15 Taylor J. Smith

16 *Attorneys for Defendants*
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PROOF OF SERVICE

I, Michelle Hansen, am a citizen of the United States and employed in Salt Lake County, Utah. I am over eighteen (18) years of age and not a party to this action. My business address is 50 West Broadway, 10th Floor, Salt Lake City, Utah 84111. My email address is mhansen@kba.law.

On January 10, 2025, I hereby certify that I served a true and correct copy of the foregoing **UNOPPOSED REQUEST FOR EXTENSION OF TIME TO DISCLOSE POTENTIAL EXPERT REPORT TOPICS** was electronically filed with the Clerk of Court using CM/ECF. Copies of the foregoing document will be served upon the following interested counsel via transmission of Notices of Electronic Filing generated by CM/ECF:

Daniel O. Blau (CA Bar No. 305008) Daniel Lim (CA Bar No. 292406) Jacob Regenstreif (CA Bar No. 234734) SECURITIES AND EXCHANGE COMMISSION Katharine E. Zoladz, Regional Director Douglas Miller, Regional Trial Counsel 444 S. Flower Street, Suite 900 Los Angeles, California 90071 Telephone: (323) 965-3998 Facsimile: (213) 443-1904 Email: BlauD@sec.gov Email: LimDa@sec.gov Email: RegenstreifJ@sec.gov <i>Attorneys for Plaintiff Securities and Exchange Commission</i>	Jordan E. Goodman 11 Moorefield Court Durham, North Carolina 27705 Email: jordan@moneyanswers.com <i>Pro Se</i>
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X	By E-mail or Electronic Transmissions. I caused the documents to be sent to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.
X	STATE: I declare under penalty of perjury under the laws of the State of California that this is true and correct.

Executed on January 10, 2025, at Salt Lake City, Utah.

/s/ Michelle Hansen
Michelle Hansen